

in the UNITED STATES DISTRICT Court
NORTHERN DISTRICT OF OKLAHOMA

FILED

SEP 10 2018

Miss Glenn A. Porter #99595
D.C.C.C. / VA 103
129 CONNER Rd,
HOMINY, OK 74035

Mark C. McCarth, Clerk
U.S. DISTRICT COURT

18 CV- 472 JED - FHM

Case NO: _____
(supplied by Clerk)

Miss Glenn A. Porter
Plaintiff

v.

1. Joe Allbaugh, Director, O.D.O.C.;
2. Greg Williams, Deputy Director, O.D.O.C.;
3. Janet Dowlins, Warden;
4. Patricia Jones, M.D. J.H.C.C.
5. Michelle Lehnus, H.S.A.
6. Betheny Wagener, P.A.
7. Dr. Joel McCurdy, Chief Med. Director, O.D.O.C., et. al.

CIVIL RIGHTS COMPLAINT
42 USC 1983
(JURY DEMAND)

A. JURISDICTION

- (1) - Miss Glenn Porter, plaintiff, Pro-Se, is a Citizen of OKLAHOMA, who resides at: D.C.C.C., 129 CONNER rd, Hominy / OKLAHOMA, 74035. #1
- (2) - Joe Allbaugh, Defendant, is a Citizen of OKLA City, OK, and is the Director, O.D.O.C. and was acting under Color of STATE LAW at the Time of ACCRUAL of this Action;
- (3) - Greg Williams, Defendant #2 is a Citizen of Oklahoma, and is Employed as Deputy Director, O.D.O.C. and was acting under Color of STATE LAW at time of Accrual of Action;
- (4) - Janet Dowlins #3, Warden, D.C.C.C. is a Citizen of OKLAHOMA and was acting under Color of STATE LAW;
- (5) - Patricia Jones #4, M.D. J.H.C.C. Lexington OK. was acting under Color of STATE LAW Providing Med. Services to D.O.C. Inmates;
- (6) - Michelle Lehnus #5, H.S.A., D.C.C.C., Hominy OK, was acting under Color of STATE LAW Providing Med. Services to DOC Inmates;
- (7) - Betheny Wagener #6, P.A., D.C.C.C., Hominy OK, was acting under Color of STATE LAW Providing Med Services to DOC Inmates;
- (8) - Joel McCurdy #7 Chief Medical Director, D.O.C. OKLA. City, OK, was acting under Color of STATE LAW as Medical Director for Inmates in DOC.

• Jurisdiction is INVOKED PURSUANT TO 42 USC 1983, 42 USC 13981, (GMVA); 42 USC 15,601 et. seq. (PREA)

B. NATURE OF CASE

I AM A TRANSGENDER FEMALE, A WOMAN DIAGNOSED WITH GENDER DYSPHORIA by Dr. LANE, MD, and Dr. SAM MUSSA, MD, ON OCTOBER 4th 2016, see: Electronic Health Record (EHR), while I WAS HOUSED AT A GEO PRIVATE PRISON LAWTON OK. I WAS PLACED ON HORMONE THERAPY, ESTRADIOL and Aldactone; Chief Medical Director O.D.D.C. DID ASSIST IN THE DIAGNOSIS AND THE INITIATION OF (HRT) ON APPROX. 18th OF OCTOBER 2016. I WAS TOLD ONCE I STARTED HORMONES I'd BE ON THEM FOR LIFE. THIS ALL TOOK PLACE BEING INITIATED BY MEDICAL STAFF AND PURSUANT TO GRIEVANCE PROCESS, see: LCF-16-b30 Amended on direction of Medical Director DOC to LCF-16-551. (All Grievances, Medical Requests are Retained by Plaintiff). Relief Was Granted for Gender Dysphoria. Exhibit (A).

APPROX. 2 years INTO THERAPY AND TRANSITION Patricia Jones from Joseph Hart Come to D.C.C.C. and Saw me (Done time, less than 45 min. and Ate Most of That Time. May 17, 2018. She Said in A Summary I WAS "Masquerading" AS A WOMAN" and "Didn't have Gender Dysphoria". She's saying IM A MAN WHICH IS A [DEMEANING Reference] TO MY "GENDER". PROHIBITED BY PREA AS [Sexual Harrassment] 42 USC 15,601 ss 15,6 (2); 28 CFR ss 15,6 (2). and A.P.A. PHYSICIANS ASSISTANT USED THIS TO STOP MY HORMONE THERAPY, CAUSING MY TESTOSTERONE TO SURGE and MY ESTROGEN TO CRASH. PLACING ME IN A SERIOUS RISK OF HORM and Irreparable INJURY TO MY HEALTH AND SAFETY SHORT TERM and LONG TERM.

MY ESTROGEN levels are EXTREMELY high and Testosterone EXTREMELY LOW.

AT THE BEGINNINGS OF MY (HRT) I WAS AT THE POINT OF doing my own Surgery. I Cannot Live AS A Man in A Man's Body. I WANT. I WAS AND Am Very Ashamed, Confused, Embarrassed Withdrawn and Not Able to COPE AS A WOMAN LOCKED IN A Man's Body. IM NOW PLACED BACK INTO THE SAME SITUATION NEEDING Sex Reassignment Surgery. (SRS) DUE TO PRISON OFFICIALS Deliberate Indifference TO my Serious medical Needs and Future health and Safety,

C. Cause of ACTION

(1), (A), (1) Count I

(A)(2), Supporting Facts: ^{NOTE} At first they said they were doing this due to diagnosis by Patricia Jones. Then later tried to switch to liver the role (C) - ~~AL~~

on October 4th of 2016 I was Diagnosed with Gender Dysphoria (I'm a Woman) Incompatible with a Male body, i.e. genitalia, Hair, Smell, Shape etc. and At the Point of my Diagnosis at Geo-Private Prison in Lawton OK, by Dr. Lane Md. and SAM Mussallam M.D., I was in Disgust, Embarrassment, Confusion, Shame, Helplessness, Mental / Emotional Distress and Seeking Sex ReAssignment Surgery. I was Placed on Hormone Replacement therapy Estradiol and Aldactone, Estrogen and Androgen Blockers, respectively, on Approx. 18 Oct. 2016 After Almost 1 year of going through Grievances. PIARA, Doc Admin. granted Relief for Gender Dysphoria - at that time. ^{Gender Appended Ex. (A)} on MAY 17 2018, Almost 2 years of Benefit from Therapy Doc had Patricia Jones Come from Joe Harp CC, at Lexington OK, to see me one time, Less than 45 minutes and Never Ask Any thing About my Gender Dysphoria, She "STOPPED" my Therapy or Caused it to be stopped by STATINS I Didn't have Gender Dysphoria. I AM A WOMAN, Have been and Reject Completely ANY Type of Male Gender Role. I Live As A Woman, I'm A WOMAN in A MALE Body I Cannot Live like this. Now they have Taken my help I recieved Benefit from, surging my Testosterone and Crashing me on Estrogen. I was granted Relief by D.O.C. Admin.

PIARA, through the Grievance Process, LCP-16-230, LCP-16-551 ^(A) They Grent Suppose to take what was Given Me Throush the Grievance Process, Violating the 8th and 14th Amend. USC in the Process with NO COURT ORDER to do so. Bethany Wasener a Physicians Assistant at DCCC STOPPED my Hormones on an order only signed by her, she is Not Liscensed to start or stop my hormones and suppressors, the Order is UN-SIGNED by Everyone Else. This Constitutes Practicing Medicine without A Liscence under the Medical Liscensure Board of OKLAHOMA, see: (EHR) (Supplid At A More Appropriate time to the Court).

In Fields v. Smith, 712 F.Supp.2d at 830, the Circuit Court held:

- " Gender Identity Disorder is A Strong, Persistent Cross Gender Identification Condition in which Individuals are CRUZZLY Imprisoned in A Body Incomptable with their Subjective Gender Identity " see: Merck Manual, Diagnosis and Therapy 1732, (18th Ed. 2006)
- " Individuals with G-ID EXPERIENCE A DEGREE of Incongruence that often is severe, Long Standing and Complete " MERCK Manual At 1732. see Also: DeLonta v. Angelone, 1330 F.3d 630.
- " When Not Properly Treated, G-ID can result in Clinically Significant Psychological Distress, dysfunction, debilitating depression, and for some people, self mutilation / Auto Castration / Penectomy, Thoughts and Attempts of Suicide and death " Fields Id. At 830, Also see: Diagnostic and Statistical Manual of Mental Disorders, 576 1578 (4th Edr 2000).

Fn. 1 - see LCP-16-230 (later Amended to LCP-16-551)

PIARA (GRANTED Relief) Complete set of documents available. ^{Gender Appended Ex. (A)} Fn. 2 - see: AFFIDAVIT of Chantel Williams who was Also Allegedly ^{Gender Appended Ex. (A)} ~~Gender Appended Ex. (A)~~ ^{Gender Appended Ex. (A)}

C-A-3 Additional Supporting Facts

Since Arrival at D.C.C.C. Everything Miss Porter had with Respect to Therapy was taken Prior to the taking of her hormones. D - USCA Amend. 8, 14

- (1) She was ordered Psychotherapy every 30 day in Conjunction with Hormone therapy - October 2016.

Since Arrival At DCCC Miss Porter has been Denied Psychotherapy by A Psychologist Every 30 days. A.J. Williams is A Social Worker Not Qualified to Provide Psychotherapy - USCA Amend. 8, 14.

+ This is Exhausted Also -

- (2) Miss Porter had A resdoll and 3 teddy Bears Approved As Therapy for 6 years Which Was Taken on Arrival At D.C.C.C. ^{USCA Amend. 8, 14, this is therapy} For me and has been Approved by Mental Health for 6 years.
+ This is Also Exhausted.

• these Additional facts Will go to State of Mind Also.

• But is Included As Additional Facets of CLAIM (1) -

- (3) Prison officials At D.C.C.C. with Exception to Bra's and Panties Do Not Provide or Make Available Any Female Clothings to Miss Porter As required by Case Authority and is Provided to other Transgender Female At Joseph Horp Violating Equal Protection, 14 Amend. USC. 8th Amend USC.

- (4) - Prison officials At D.C.C.C. Does Not Provide or Make Available Female Cosmetics to Miss Porter and is in Violation of Equal Protection. As items are Provided to other Transgender Female At Joseph Horp. 8 / 14 Amend. USC.

CLAIM 1 - C-A-3-(1)(2)(3) is All Fully Exhausted Also -

- (5) - There are No Medical STAFF At DCCC Qualified or Licensed to STOP my Hormones (or) Monitor Plaintiff during Withdrawal. When HRT WAS Initiated I was told that I could not (3) (A) + ...

DIAGNOSIS

- The American Psychiatric Association's Diagnostic and Statistical Manual of MENTAL DISORDERS recognizes the Following Criteria for GID:
- (1) Evidence of a strong Persistent Cross Gender Identification, which is the "DESIRE to BE" (or) "Insistence ONE is of the other sex"
 - (2) Evidence of "Discomfort about ONE'S Assigned sex" (or) "A Sense of Inappropriateness in the Gender Role of that sex"
 - (3) the Diagnosis is NOT MADE IF there is A Concurrent Inter-Sex Condition; and,
 - (4) Evidence of Clinically "Significant Distress" (or) "Social Impairment" in "Social or other Occupational" (or) "other Areas of functioning" see: DSM-IV, 576
- • The World Health Organization's International Classification of Diseases, Holds: "GID is characterized by A Persistent and Intense Distress About Assigned sex", Together with "A Desire to Be" (or) "Insistence one is of the other sex" see: WHO's International Classification of Diseases, F64.2 (2007 ed.),
- • the Lives of Some Individuals revolve only Around the Activities that lessen their Distress, DSM-IV - At 578. WHO has Also recognized "GID Creates A Profound Disturbance of the Normal Gender Identity" and "A Persistent Preoccupation with the Dress and Activities of the Opposite sex", with "repudiation of the Individuals Own Sex" "Individual with GID Live in A Dissociated State of Mind and Body" see: NCHC Position Statement, Transgender Health Care in Correctional Settings. Fields, supra. At 830.

The Risk of Present / Future Harm

As A Result of the Disorder, SOME MALE to FEMALE Individuals with GID resort to Self Treatment with Hormones (or) Attempt their own Castration or Penectomy. DSM-IV At 578. IN These Cases Suicide Attempts, and Substance Related Disorders are Commonly Associated. Fields at 830. "The Literature in the field is Replete with Accounts of Individuals who Have Taken their Own Lives" (or) Attempted to Do So Because their GID Was Not PROPERLY Assessed and Treated". See: George E BROWN, Auto Castration and Auto Penectomy As Surgical Self Treatment in Incarcerated Persons with GID at 31-39.

- AS A [Result] of Being [Deprived] of the "PRESCRIBED HORMONE" Therapy, Plaintiff Miss Porter, experiences Confusion, Embarrassment, Depression, Fear, Break outs of the skin, Hair on Face and Breasts, Legs, her smell Changes to Smell Like A MAN, It will likely seriously affect the Benefit obtained in the last 1 1/2 years. This is An Attempt by OFFICER to Alter My ~~Gender~~ Identity And should Not Be Employed See: National Commission on Correctional Health Care Board of Health Practices in Correctional Settings. 2012. 116

Loss of APPetite, Nausea, Mental and Emotional Instability, Hot flashes, Anxiety. (NONE of Plaintiffs Medical Requests on this STUFF has been Seen by A Doctor) All returned with dates only. Documents Plaintiff Retains.

in De'lonia V. Anselone, 330 F.3d At 630, "A MALE to Female Patient was Abruptly Barred from Hormone therapy, developing An un Controllable urge to Mutilate her Genitals". Id. At 632.

The Lack of Hormone therapy will Wreak Havoc in A Persons life, [Especially] one who has Previously recieved Treatment, which is Neither Compensable nor Speculative. see: Phillips V. Michigan Dept. of Corrections 1731 F.Supp. 792 at 800; Also: Citins: Fields, Supra, At 830.

→ For These Reasons Miss Porter, Plaintiff, is being Exposed To A [Serious Risk of Future Harm], Prison OFFICIALS, Aware of the Risk are Acting with deliberate Indifference to Miss Porters Serious Medical needs, Violating the 8th Amend. USC.

IN SUNDSTROM V. FRANK, NO: 06-C-112, (E.D. Wis. 2006), The Court: " GRANTED PRELIMINARY INJUNCTION ENJOINING PRISON OFFICIALS FROM [WITHDRAWING] HORMONE THERAPY FOR [TRANS GENDER PRISONERS] BASED ON "likelihood" they would Be Able to Establish AN 8th Amend. Violation By Showing that IRREPARABLE INJURIES to their Long TERM Health would Arise, from Withdrawal of Hormone therapy". (Emphasis)

in Cuaco V. Maritsusu, 223 F.3d 99 at 106, held:

" Transsexualism is A Serious Medical need"

Also see: Meriwether Courts definition of transsexualism, using the Merck Manual and D.S.M. IV, Appended Courtesy References. ACLU and MCLR medical Care Newsletter Pgs. (7), (8) (9) Providing A Variety of Case Authority. Exhibit (B).

→ Miss Porter, Plaintiff is seeking Sex Reassignment Surgery (SRS) and Making Repeated Requests and Grievances has Not been Evaluated by A GID Specialist for Surgery. Neither has Miss Porter Been Seen by A Specialist on Diagnosis and Surgery outside D.C. This Allegation Alone STATES A Claim of Deliberate Indifference. De'lonia V. Anselone, 708 F.3d At 526 n.4.

Note: in Fields V. Smith, 1712 F.Supp. 2d 830, the Circuit Court of Appeals held: "Denying medically Necessary Transition Related Health Care VIOLATED the 8th Amendments Prohibition Against Cruel and UNUSUAL Punishment"

D.

Relief Requested

- (1) - Emergency Temporary RESTRAINING ORDER, Restraining Prison Officials from Stopping Hormone Therapy i.e. Estradiol 8ms. daily / Aldactone 300ms. Daily. Miss Porters Daily Dosage After 2 Years of Therapy.
- (2)(A) Injunctive Relief, Enjoining Prison officials from Withdrawal of Hormone Therapy Preventing 8th Amend. Violation from Irreparable Injuries to her long term Health due to Withdrawal of Hormone Therapy.
- (B) enjoin Prison officials from Provide Sex Reassignment Surgery, And Preventing officials from leaving Miss Porter Plaintiff in transitional state with the Secondary Sex Characteristics she currently has as a result of 2 years of Hormone therapy and withdraws Hormones and Forces Miss Porter or Attempts to Force her to Live As A MAN.

Note: Miss Porter has in the Electronic Health Record (EHR) A Waiver of Any Liability Incurred by Miss Porter as a result of Hormone Therapy, of which so far there is none,
Signed At Geo Private Prison Canton Ok.
Approx. Nov. 2016.

Miss Porter also has in the (EHR) A Diagnosis of Gender Dysphoria Oct. 4 / 2016.

Exhaustion

Miss Porter Plaintiff has Exhausted This Claim, for Purposes of PLRA, using Grievance Process.

Miss Glenn Porter

Miss Glenn Porter 99595
DCCC VA 103
129 Conner rd.
Hemphill Ok.
74035
Plaintiff Pro-Se

Grievance Number: Resubmitted LCF-16-551
 Offender Name and DOC Number: Glenn A. Porter-DOC #99595
 Facility Location: Lawton Correctional Facility

Your resubmitted grievance appeal dated September 20, 2016 was received on September 22, 2016. All of your correspondence was thoroughly reviewed. The actions you believe the Reviewing Authority may lawfully take, and my response, are provided below.

Request:

"... to be provided with required treatment for Gender Dysphoria "Hormone Replacement Therapy"..."

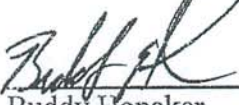
Response:

Pertinent information from your electronic health record (EHR) was reviewed. According to your record, you were approved for hormone replacement therapy and the medications were ordered on October 18, 2016. According to Jacqueline Wells at Lawton Correctional Facility, you received the keep on person medications on October 21, 2016, October 24, 2016, and November 15, 2016.

If you need further assistance with any health concerns, you must submit a "Request for Health Services" form (attached) to the medical unit at your facility, via the sick call process.

Disposition: (1) – Relief granted.

OP-090124 entitled "Inmate/Offender Grievance Process," Section VII.D states, "The ruling of the administrative review authority or chief medical officer is final and will conclude the administrative remedy available to the inmate/offender within the jurisdiction of the Oklahoma Department of Corrections. The inmate/offender will have satisfied the exhaustion of administrative remedies required by 57 O.S., Section 564. The grievance procedure, however, does not satisfy the additional requirements for exhaustion of administrative remedies required by the Governmental Tort Claims Act, 51 O.S., Section 151 et seq."



Buddy Honaker
 Medical Services Administrator

11-22-16
 Date

BH/cr

CC Christina Thomas
 Latoya Dawson
 Hector Rios
 Greg Williams (Brenda Bryant)
 File

EXHIBIT(A)



OKLAHOMA DEPARTMENT OF CORRECTIONS
MEDICATION REFILL SLIP



(to be used for provider's prescription medication(s))

Refills must be submitted within 10 days before run out or 20 days from issue date.

Date: 4 July 18 Facility: D.C.C.C. Housing Unit: V/A Bunk/Cell Number: L/#103
Inmate Name: Miss Porter Glenn ODOC #: 099595
(Last, First)

| Prescription Number or Barcode Label | Medication Name | Prescription Number or Barcode Label | Medication Name |
|--|-------------------------|--|---|
| <u>Estradiol</u> | <u>2 mg</u> |  203977559 PORTER,G 99595 ASPIR-LOW 81 #87048160 DCCC,070719 | <u>Low Dose Aspirin</u> <u>81 mg</u> |
|  203202760 PORTER,G 99595 SPIRONOLACTO #86724701 DCCC,090918 | <u>Aldactone 100 mg</u> | <u>PRENATAL</u> <u>Tab</u> | |

- The prescription number can be found halfway down the left-hand side of the medication label (RX #).
- The medication name is located on the top left-hand corner of the medication label beneath the inmate's name.

Date Received: 4/4/18 Dec 7/10/18 Dec 7/16/18
TO BE COMPLETED BY HEALTH SERVICES
You have no refills left on your prescription(s) Estradiol Aldactone. You
will need to submit a "Request for Medical Services" (OP-140117A) to see the medical provider and get a renewal.

Medication Refill Slips must be maintained on file by CHSA for 30 days after the medication has been issued or administered to the inmate.

ODOC 140130M (R9/16)

Fourth, prison and jail staff may violate the Constitution if they refuse to evaluate a prisoner for GD or if they take too long to do so. Prison officials often put off or outright deny transgender prisoners access to health care for GD, even though courts have repeatedly found that such delays or denials of assessment or treatment violate the Constitution.³⁹ Even delays in starting treatment because a prisoner will be released soon may violate the Eighth Amendment.⁴⁰ One common reason prisoners with GD are denied adequate treatment is that very few prisons have health care staff with expertise or training to treat GD. However, denying prisoners' access to a health care provider with the necessary expertise may violate the Constitution, as many courts have concluded.⁴¹

Because the Eighth Amendment requires that prison officials actually be aware of serious medical needs, you should be sure to file appeals whenever staff refuse to evaluate you for GD or fail to provide you with care. You should also describe the symptoms you are experiencing without that care.

NECESSARY MEDICAL CARE FOR MANY TRANSGENDER INDIVIDUALS INCLUDES ACCESS TO CLOTHING AND GROOMING STANDARDS CONSISTENT WITH GENDER IDENTITY

Most prisons and jails have very strict policies about clothing and grooming. For example, prisons generally only allow prisoners to wear prison or jail issued clothing items and may force prisoners to keep their hair a certain length.

When such restrictions are applied to transgender people, they can make their GD much worse. Many transgender prisoners are not given clothing appropriate for their gender identity—often, transgender women in male facilities are denied access to bras and other undergarments. Similarly, transgender men are sometimes required to keep their face clean-shaven, and transgender women are sometimes not allowed to grow their hair past a certain length (or are forced to have their heads shaved during the intake process).

Such experiences can be psychologically harmful for transgender prisoners. As a result, staff might violate the Eighth Amendment if they do not allow you to have gender-appropriate clothing and grooming supplies, such as makeup and hair removal tools, or deny your request to present consistently with your gender identity.⁴²

Because of this, several county jails have good policies regarding clothing and grooming. For example, King County, Washington allows transgender women to order from the commissary and wear the same items, such as bras, as other females at the facility.⁴³ Similarly, Cumberland County, Maine allows transgender men and women to dress, groom, and use names and pronouns that are consistent with their gender identity.⁴⁴

While it might be very hard for you to get the medical care you need, here are a few things you can do:

- Look for policies about transgender prisoners, including policies about medical care. They may be in the prison law library. If not, you can ask staff for copies or send a public records request for all policies about transgender prisoners.
- If you were receiving hormones from a doctor prior to incarceration, have your medical records sent to the medical or health director at your facility.
- Get a copy of the WPATH *Standards of Care* to show the prison medical staff, or tell them where to find them (<http://www.wpath.org/>). Be sure to ask for care in writing, and send a copy to the health director of your prison or jail.
- Even if you are told that denials of medical and mental health care cannot be appealed, file appeals anyway. Try to get a medical staff member to respond to your appeals about care instead of correctional staff. If correctional staff answer your grievance, request at the next level that medical staff respond to your appeal since it involves medical issues.

20 Janet Mock, "Chelsea Manning & the Battle for Trans Inclusive Health Care Without Bias" [August 22, 2013], available at <http://janetmock.com/2013/08/22/chelsea-manning-transgender-healthcare/>.

21 See *Estelle v. Gamble*, 429 U.S. 97, 103 [1976] ("[Eighth Amendment] principles establish the government's obligation to provide medical care for those whom it is punishing by incarceration.").

22 *Gayton v. McCoy*, 593 F.3d 610, 620 [7th Cir. 2010]. See also *Fennell v. Quintela*, 393 F. App'x 150, 157 [5th Cir. 2010]; *Atkinson v. Taylor*, 316 F.3d 257, 266 [3d Cir. 2003]; *Clement v. Gomez*, 298 F.3d 898, 904 [9th Cir. 2002] [internal quotation marks omitted]; *Harrison v. Barkley*, 219 F.3d 132, 136 [2d Cir. 2000] [internal quotation marks omitted].

23 See *Helling v. McKinney*, 509 U.S. 25, 33 [1993]. See also *Soneeya v. Spencer*, 851 F. Supp. 2d 228, 248 [D. Mass. 2012] [prison officials deliberately indifferent where they failed to "remove[] the risk of serious future harm" stemming from GID]; *De'Lonta v. Angelone*, 330 F.3d 630, 634 [4th Cir. 2003] ("[Plaintiff's] need for protection against continued self-mutilation constitutes a serious medical need to which prison officials may not be deliberately indifferent.").

24 See, e.g., *Edwards v. Snyder*, 478 F.3d 831, 832 [7th Cir. 2007] [treatment cannot be "blatantly inappropriate"];

Collignon v. Milwaukee Cnty., 163 F.3d 982, 989 [7th Cir. 1998] [medical treatment in prison cannot be such that "no minimally competent professional would have so responded under those circumstances"]; *Ancata v. Prison Health Servs., Inc.*, 769 F.2d 700, 704 [11th Cir. 1985] [medical care in prison cannot be "so cursory as to amount to no treatment at all"].

25 See, e.g., *Cuoco v. Moritsugu*, 222 F.3d 99, 106 [2d Cir. 2000] ["We assume for purposes of this appeal that transsexualism constitutes a serious medical need."]; *Brown v. Zavaras*, 63 F.3d 967, 970 [10th Cir. 1995] [prison officials must provide treatment to address the medical needs of transsexual prisoner]; *Meriwether v. Faulkner*, 821 F.2d 408 [7th Cir. 1987] [recognizing transsexualism as a serious medical need that should not be treated differently than any other psychiatric disorder]; *Phillips v. Michigan Dep't of Corrections*, 731 F. Supp. 792, 799 [W.D. Mich. 1990] [complete refusal by prison officials to provide a person with GID with any treatment at all would state an Eighth Amendment claim]. Note also that various physical manifestations of GID, such as genital mutilation, are also considered serious medical needs within the meaning of the Eighth Amendment. See, e.g., *De'Lonta*, 330 F.3d at 634 ["[N]eed for protection against continued self-mutilation [because of GID condition] constitutes a serious medical need."].

26 See, e.g., *Meriwether*, 821 F.2d at 413 [transgender prisoner has right to some form of treatment, but not to her choice of a "particular type of treatment, such as estrogen therapy"]; *Briones v. Grannis*, CV 09-08074-VAP(VBK), 2010 WL 3636139, at *6 [C.D. Cal. Sept. 14, 2010] [failure to provide transgender prisoner with the specific type of hormone treatments she requested did not constitute an Eighth Amendment violation].

27 See, e.g., *Harris v. Thigpen*, 941 F.2d 1495, 1509 [11th Cir. 1991] [treatments cannot be denied merely because they are expensive]; *Barrett v. Coplan*, 292 F. Supp. 2d 281, 285 [D.N.H. 2003] [treatment must be "based on medical considerations"]; *Kosilek v. Maloney*, 221 F. Supp. 2d 156, 182 [D. Mass. 2002] [treatments cannot be denied merely because they are controversial].

28 See *Fields v. Smith*, 653 F.3d 550, 557 [7th Cir. 2011] [rejecting prison security argument because "transgender inmates may be targets for violence even without hormones" and defendants' expert "testified that it would be 'an incredible stretch' to conclude that banning the use of

hormones could prevent sexual assaults"]; *Kosilek v. Spencer*, 889 F. Supp. 2d 190, 240-41 [D. Mass. 2012].

29 See *Battista v. Clarke*, 645 F.3d 449, 454-55 [1st Cir. 2011]; *Tates v. Blanas*, No. S-00-2539, 2003 WL 23864868, *10 [E.D. Cal. 2003] [officials must balance security risks of providing transgender prisoner with bra against her medical needs]; *Kosilek*, 221 F. Supp. 2d at 191 ["It has been, and remains, permissible for [prison officials] to consider the security implications of the medical care prescribed for [transgender prisoners]"].

30 See *Moore v. Duffy*, 255 F.3d 543, 545 [8th Cir. 2001] ["[M]edical treatment may so deviate from the applicable standard of care as to evidence a physician's deliberate indifference."]; *Estate of Cole v. Fromm*, 94 F.3d 254, 262 [7th Cir. 1996] [Eighth Amendment violation where treatment represents "such a substantial departure from accepted professional judgment, practice, or standards as to demonstrate that the person responsible did not base the decision on such a judgment"]; *United States v. DeCologero*, 821 F.2d 39, 43 [1st Cir. 1987] [Eighth Amendment guarantees medical care "at a level reasonably commensurate with modern medical science and of a quality acceptable within prudent professional standards"]; *Barrett*, 292 F. Supp. 2d at 286 [D.N.H. 2003] ["Adequate medical care" requires treatment by qualified medical personnel who provide services that are of a quality acceptable when measured by prudent professional standards in the community, tailored to an inmate's particular medical needs, and that are based on medical considerations."]. See also above, n.23.

31 *De'Lonta*, 708 F.3d at 522-23 [WPATH standards "are the generally accepted protocols for the treatment of GID"]; *Fields*, 653 F.3d at 553-54 [characterizing the WPATH standards as the "accepted standards of care"]; *Kosilek*, 221 F. Supp. 2d at 166 [same].

32 WPATH, *Standards of Care for the Health of Transsexual, Transgender, and Gender-Nonconforming People*, Version 7 ("Standards of Care"), at 67 ["Access to these medically necessary treatments should not be denied on the basis of institutionalization or housing arrangements."].

33 *Standards of Care*, at 22-23 [recommended minimum credentials for mental health professionals who work with adults presenting with gender dysphoria]; at 8-10 [treatment is individualized to include one or more of psychotherapy, change of gender expression or role, hormone therapy, and surgery, since individual's treatment needs vary].

34 See, e.g., *Fields*, 653 F.3d at 555 ["Although DOC can provide psychotherapy as well as antipsychotics and antidepressants, defendants failed to present evidence rebutting the testimony that these treatments do nothing to treat the underlying disorder."]; cf. *Edwards*, 478 F.3d at 831 [a prisoner's receipt of some medical care does not automatically defeat a claim of deliberate indifference if a fact finder could infer the treatment was so "blatantly inappropriate as to evidence intentional mistreatment likely to seriously aggravate a medical condition."]; *Johnson v. Doughty*, 433 F.3d 1001, 1013 [7th Cir. 2006] [prisons cannot simply choose an "easier course of [medical] treatment that they know is ineffective"].

35 See *De'Lonta*, 330 F.3d at 634-35; *Wolfe v. Horn*, 130 F. Supp. 2d 648, 693 [E.D. Pa. 2001]; *Phillips*, 731 F. Supp. at 800 ["Taking measures which actually reverse the effects of years of healing medical treatment . . . is measurably worse [than failing to provide such treatment in the first place]."].

36 See *Fields*, 653 F.3d at 557-58 [Wisconsin's blanket ban on hormone therapy and sex reassignment surgery constituted facial violation of Eighth Amendment]; *De'Lonta*, 330 F.3d at 635 [allegations of denial of treatment based on blanket policy rather than medical judgment sufficient to support claim for deliberate indifference]; *Allard v. Gomez*, 9 F. App'x 793, 795 [9th Cir. 2001] [deliberate indifference if transgender prisoner was denied hormone therapy as result of blanket rule]; *Soneeya*,

41 See *De Ionia*, 708 F.3d at 526 n. 4 (allegation that prisoner had not been evaluated by a GID specialist for surgery stated claim of deliberate indifference); *Kosilek*, 221 F. Supp. 2d at 161, 189 (prisoner who was only seen by social worker and psychiatrist who did not have experience diagnosing GID had never received an individualized medical evaluation, since she had not been evaluated by qualified medical staff); see also,

40 See *McKenna v. Wright*, 386 F.3d 432, 437 (2d Cir. 2004) (extended delay in starting Hepatitis C treatment because prisoner might be released within twelve months stated claim under Eighth Amendment).

could constitute deliberate indifference).
 urinary tract infection and delay of one day in treating serious leg injury
v. Norman, 317 F.3d 558, 562 (6th Cir. 2003) (delay of one week in treating before seeing a hand specialist constituted deliberate indifference); *Wallin*
Jett v. Penner, 439 F.3d 1091, 1097-98 (9th Cir. 2006) (delay of over a year prisoner's request for hormone therapy showed deliberate indifference);
 poor explanations, mistakes, changes in position and rigidities "regarding Amendment); *Battista*, 645 F.3d at 455 (extreme "composite of delays,

prisoners with GID for hormone therapy or surgery violated Eighth at 558-59 (stating that prevented medical personnel from evaluating for surgery could constitute deliberate indifference); *Fields*, 653 F.3d F.3d 520, 525 (4th Cir. 2013) (failure to evaluate transgender prisoner medically necessary but nonetheless refused to provide it); *De Ionia*, 708

prisoner alleged that prison health official knew hormone therapy was Cir. 2014) (possible Eighth Amendment violation where transgender to medical care"); *Kothmann v. Rosario*, 558 F. App'x 907, 911 (11th deliberate indifference by intentionally denying or delaying access

39 See, e.g., *Estelle*, 429 U.S. at 104-05 (prison officials may manifest services, prior to incarceration.").

will not be precluded solely due to level of services received, or lack of individualized assessment and evaluation" and that "[t]reatment options of the Bureau with a possible diagnosis of GID will receive a current

38 Federal Bureau of Prison Program Statement 6031.04 ("Patient Care"), dated June 3, 2014, at 42 (providing that "inmates in the custody

2014) (denial of hormones pursuant to freeze frame policy may violate the *v. Lewis*, No. 7:14-CV-24 HL, 2014 WL 1813725, at *2-3 (M.D. Ga. May 7,

are first diagnosed in prison."); *Kosilek*, 221 F. Supp. 2d at 193 (while no exception to [the Eighth Amendment] for serious medical needs that in part on other grounds, 289 F. Supp. 2d 286 (N.D.N.Y. 2003) "[t]here is

37 See *Brooks v. Berg*, 270 F. Supp. 2d 302, 313 (N.D.N.Y. 2003), vacated prisoners' medical needs states Eighth Amendment claim).

treatment for chronic pain without individualized assessment of 2008 WL 3871710, at *8 (D. Nev. Aug. 19, 2008) (blanket policy prohibiting

purposes of alleviating moderate chronic pain could support deliberate 158, 166-67 (2d Cir. 2003) (policy forbidding treatment of keloid scars for one "good eye" violated Eighth Amendment); *Brook v. Wright*, 315 F.3d

[blanket policy of denying cataract surgery where prisoners had at least See also *Colwell v. Bannister*, 763 F.3d 1060, 1068-70 (9th Cir. 2014)

of an individual prisoner's medical needs violates Eighth Amendment). that prohibits prison's medical staff from making medical determination the Eighth Amendment"); *Kosilek*, 221 F. Supp. 2d at 176 (blanket policy

and prescribing and providing adequate care to treat those needs violates making a medical determination of an individual inmate's medical needs 2d at 286 ("A blanket policy that prohibits a prison's medical staff from hormone treatment violates Eighth Amendment); *Barrett*, 292 F. Supp.

2006 WL 2772748, at *8 (D. N.J., Sept. 25, 2006) (policy of withholding clothing violates Eighth Amendment); *Houston v. Trella*, No. 04-CV-1393, 851 F. Supp. 2d at 250 (blanket prohibition on female canteen items and

44 Cumberland County Sheriff's Office, Policy and Procedure, Transgender Inmates, No. D-243A (Dec. 2009).

43 King County, Department of Adult and Juvenile Detention, Adult Divisions, General Policy Manual, 6.03.007 (April 2, 2014).

right to wear makeup and women's clothing in prison).
 plaintiff's equal protection and free speech/expression claims regarding lenses); *Star v. Gramley*, 815 F. Supp. 276, 278 (C.D. Ill. 1993) (rejecting

claims regarding prison's prohibition against hair extensions and contact Supp. 2d 322, 343 (D. Conn. 2004) (rejecting plaintiff's equal protection

forbidding him from drawing his eyebrows in); *Powell v. Cusimano*, 326 F. claim that prison officials violated his generalized due process rights by 2007 WL 98980, at *2 (W.D. Va. March 30, 2007) (rejecting plaintiff's

clause of the 14th Amendment); *Nelson v. Anderson*, No. 7:07-cv-00149, plaintiff to wear women's clothing did not violate the equal protection

229956, at *13 (S.D.N.Y. Jan. 30, 2009) (prison officials' refusal to allow legal arguments for right to gender expression in prisons have not been

plaintiff's GID treatment constituted deliberate indifference). Other delay in providing female canteen items and clothing necessary for

Amendment violation); *Soneya*, 851 F. Supp. 2d at 246 (prison officials' undergarments, and facial hair removal might give rise to an Eighth

(prison officials' denial of plaintiff's requests for makeup, women's 42 See *Konitzer v. Frank*, 711 F. Supp. 2d 874, 908-11 (E.D. Wis. 2010)

indifference).
 specialist or a psychiatrist without a court order was deliberate (prison's refusal to provide specialty consultations from an orthopedic

Aneta v. Prison Health Servs., Inc., 769 F.2d 700, 704 (11th Cir. 1985) specialist despite requests for further treatment from the prisoner);
 when he failed to refer prisoner for re-evaluation for surgery to a 1994) (jury could conclude that prison doctor was deliberately indifferent

deliberate indifference); *Hathaway v. Coughlin*, 37 F.3d 63, 68-69 (2d Cir. for treatment" and performing surgery one is not qualified for can be

indifferent for failing to refer prisoner for specialist care at any point; reattached accidentally severed finger could be found deliberately

v. Kaplan, 241 F.3d 1272, 1278-79 (10th Cir. 2001) (prison doctor who or tell patient to seek one out was deliberate indifference); *Oxendine*

F.3d 429, 440 (6th Cir. 2001) (failure to make timely referral to specialist could support deliberate indifference finding); *LeMarbe v. Wisneski*, 266

a specialist where doctor did not know cause of reported extreme pain e.g., *Hayes v. Snyder*, 546 F.3d 516, 526 (7th Cir. 2008) (refusal to refer to

OKLAHOMA DEPARTMENT OF CORRECTIONS
Male to Female
Hormonal Therapy Risk and Information Form

Hormone therapy may be all the treatment you need for your gender dysphoria. While you are being treated with hormones, you will be monitored to determine if the hormone treatment is benefiting you. Before starting hormone treatment you are encouraged to exercise regularly and stop smoking. Exercise improves the benefits of hormone treatment, while smoking causes increased risk of thromboembolic disease (blood clots) associated with hormone treatment. These blood clots can cause stroke, heart attack, lung damage, and/or death. To reduce the risk of forming blood clots, daily aspirin is often recommended for persons taking estrogen.

Blood tests will be taken to determine your health and suitability to begin hormone therapy. Some people may be unable to take hormones due to other health conditions.

You may be frustrated with how long hormone therapy takes to produce results, and you will need to be realistic about the extent of changes you can expect. For example, hormones cannot change the shape or height of your skeleton.

Estrogen can be prescribed for transsexual women with gender dysphoria and is often helpful in making their appearance more feminine.

- Noticeable changes may include:
- your penis and testicles may get smaller
- your body may redistribute body fat into a more female shape
- you may have less muscle
- you may have some breast development

There may be side effects, although some transsexual women report feelings of calm and well-being after starting on hormone treatment.

Estrogen side effects may include:

- chest pain or heavy feeling, pain spreading to the arm or shoulder, nausea, sweating, general ill feeling;
- sudden numbness or weakness, especially on one side of the body;
- sudden severe headache, confusion, problems with vision, speech, or balance;
- pain, swelling, warmth, or redness in one or both legs;
- migraine headache;
- pain, swelling, or tenderness in your stomach;
- confusion, problems with memory or concentration;
- jaundice (yellowing of the skin or eyes);
- swelling in your hands, ankles, or feet; or
- a breast lump.

Less serious side effects of estrogen may include:

- mild nausea, vomiting, bloating, stomach cramps;
- breast pain, tenderness, or swelling;
- freckles or darkening of facial skin;
- increased hair growth or loss of scalp hair;
- changes in weight or appetite;
- problems with contact lenses;
- mild headache, nervousness, dizziness, tired feeling; or
- mood swings.

These potential effects and side effects make it important to have regular medical check-ups.

EXHIBIT (C)

OKLAHOMA DEPARTMENT OF CORRECTIONS
Male to Female
Hormonal Therapy Risk and Information Form

Medications known as androgen suppressants help to lessen the effects of your body's own androgens (male sex hormones). Flutamide, Finasteride, and Spironolactone are androgen suppressants sometimes used as part of treatment for gender dysphoria.

Flutamide potential side effects include:

- severe liver damage with possible symptoms of nausea, vomiting, abdominal pain, unusual fatigue, loss of appetite, "flu-like" symptoms, yellow skin or eyes, itching, clay-colored stools, or dark urine
- allergic reaction
- diarrhea
- hot flashes
- skin rash
- sunlight sensitivity
- loss of sex drive
- impotence
- lowered sperm count
- enlarged breasts
- rectal bleeding, or blood in the urine

Finasteride side effects may include:

- chills
- cold sweats
- confusion
- dizziness, faintness, or lightheadedness when getting up from a lying or sitting position
- bloating or swelling of the face, arms, hands, lower legs, or feet
- breast enlargement and tenderness
- hives or welts
- itchy skin
- rapid weight gain
- redness of the skin
- skin rash
- swelling of the lips and face
- tingling of the hands or feet
- unusual weight gain or loss

Spironolactone side effects may include:

- numbness or tingling
- muscle pain or weakness
- slow, fast, or uneven heartbeat
- feeling drowsy, lightheaded, or restless
- urinating less than usual or not at all
- shallow breathing
- tremors
- confusion
- nausea
- upper abdominal pain
- itching
- loss of appetite
- dark urine
- clay-colored stools
- yellow skin or eyes

5/18/18 (C)

OKLAHOMA DEPARTMENT OF CORRECTIONS
Male to Female
Hormonal Therapy Risk and Information Form

- fever
- sore throat
- swelling of face or tongue
- burning eyes
- skin pain
- skin blistering & peeling
- headache
- intestinal gas

I have read the effects and side effects of the medication(s) which are being prescribed to me for gender dysphoria. I accept the potential risks inherent in this treatment. I have been given the opportunity to ask questions and discuss my treatment with my health care provider. By signing below, I acknowledge the risks, verify my understanding of the information provided, and consent to treatment with the medication(s) prescribed to me for gender dysphoria.

Signature: Miss Glenn Porter Date: Oct. 24th 2016

Printed Name: Miss Glenn Porter DOC#: #99595

Witness: Signed At Medical Title: X Date: Oct. 24. 2016

Witness: Geo Private Prison Lawton Title: ok q/w. Date: Oct 24 2016

(10/15)

Exhibit (C)

NOCHC
Position
Statement

Glenn Porter
LCF 4 A 113
8607 S.E. Flower Mound Road
Lawton, OK 73501

March 18, 2012

Dear Glenn,

I am contacting you from the National Center for Lesbian Rights. I received your letters and I am very sorry to hear about what you are facing in prison, and I hope the information below is useful.

NCLR's primary purpose in corresponding with you is to provide useful and free legal information on issues relevant to LGBT people, and to provide you with contact information for LGBT-friendly attorneys. I am not acting as your attorney and am not currently providing you legal advice or representing you. I am not acting as your attorney and am not currently providing you legal advice or representing you.

This letter serves to notify you of the rights of people in prison, especially the right to adequate medical care.

Here are the position statements from the National Commission on Correctional Health Care regarding transgender health care in correctional settings:

Transgender Health Care in Correctional Settings

Introduction

Transgender people face an array of risks to their health and well-being during incarceration, and are often targets of physical assault and emotional abuse. They are commonly placed in correctional facilities according to their genitals and/or sex assigned at birth, regardless of their gender presentation. The health risks of overlooking the particular needs of transgender inmates are so severe that acknowledgment of the problem and policies that assure appropriate and responsible provision of health care are needed.

The term *transgender* refers to a person who identifies with or expresses a gender identity that does not match traditional ideas about the sex assigned to the person at birth. Transgender women are people who were assigned the sex of male at birth and who now identify as women. Transgender men are people who were assigned the sex of female at birth and who now identify as men. Transgender people may identify as men, women, neither, both, or another gender. They can be of any race, sexual orientation, age, religion, body type, socioeconomic background, or national origin.

The National Commission on Correctional Health Care publishes *Standards* for prisons, jails, and juvenile justice facilities that address board-approved recommendations for an adequate health care delivery system, including issues such as patient confidentiality, discharge planning, health professional qualifications, medication availability and delivery, and staff training. Position statements are intended to provide information on the management of specific problems not addressed in the *Standards*.

Position Statement

Because prisons, jails, and juvenile justice facilities have a responsibility to ensure the physical

CA STAR 6
215675
Any Whelan, Esq.
National Center for Lesbian Rights (NCLR)
870 Market St. #370
San Francisco, CA 94102

Transgender
Health Standards
in Correctional
Facilities State/Federal

(Appendix)

National Center for Lesbian Rights (NCLR)
870 Market St. #370
San Francisco, CA 94102

and mental health and well-being of transgender people in their custody, correctional health staff should manage these inmates in a manner that respects the biomedical and psychological aspects of a gender identity disorder (GID) diagnosis. The National Commission on Correctional Health Care recommends that the following principles guide correctional health professionals in addressing the needs of transgender inmates:

Health Management

1. The management of medical (e.g., medically necessary hormone treatment) and surgical (e.g., genital reconstruction) transgender issues should follow accepted standards¹ developed by professionals with expertise in transgender health. Determination of treatment necessary for transgender patients should be on a case-by-case basis. Ideally, correctional health staff should be trained in transgender health care issues. Alternatively, they should have access to other professionals with expertise in transgender health care to help determine appropriate management and provide training in transgender issues.
2. Because inmate-patients may be under different stages of care prior to incarceration, there should be no blanket administrative or other policies that restrict specific medical treatments for transgender people. Policies that make treatments available only to those who received them prior to incarceration or that limit GID treatment to psychotherapy should be avoided. Policies that attempt to "freeze" gender transition at the stage reached prior to incarceration are inappropriate and out of step with medical standards, and should be avoided.
3. Diagnosed transgender patients who received hormone therapy prior to incarceration should have that therapy continued without interruption pending evaluation by a specialist, absent urgent medical reasons to the contrary. Transgender inmates who have not received hormone therapy prior to incarceration should be evaluated by a health care provider qualified in the area of transgender health to determine their treatment needs. When determined to be medically necessary for a particular inmate, hormone therapy should be initiated and sex reassignment surgery considered on a case-by-case basis. Regular laboratory monitoring should be conducted according to community medical standards.
4. Treatment for genital self-harm or for complications arising from prior surgery or from self-treatment should be provided when medically necessary.
5. Correctional health care providers should provide patient education materials to help transgender patients cope with their diagnosis and treatment.
6. Psychotherapy such as "reparative" therapy or attempts to alter gender identity should not be employed. Reparative therapy inappropriately portrays GID as a mental illness and not a medical condition.

Patient Safety

7. In matters of housing, recreation, and work assignments, custody staff should be aware that transgender people are common targets for violence. Accordingly, appropriate safety measures should be taken regardless of whether the person is placed in male or female housing areas.

Discharge Planning

National Center for Lesbian Rights (NCLR)
870 Market St. #370
San Francisco, CA 94102

8. Transgender inmates receiving hormone therapy should receive a sufficient supply upon release to last until a community provider assumes care. Referrals should be made to community-based organizations with sensitive and inclusive services for transgender people.
9. Correctional policies for management of transgender inmates should be developed and implemented in partnership with local transgender communities, particularly current and former inmates, and transgender service providers when possible.

*Adopted by the National Commission on Correctional Health Care Board of Directors
October 18, 2009*

I hope that the information that I have included is useful to you in advocating for yourself and protecting your legal rights.

I am including with this letter:

- 1) ACLU Know Your Rights publication on Medical, Dental and Mental Health Care
- 2) ACLU Know Your Rights publication on Assault and Excessive Force in Prison
- 3) Jailhouse Lawyer's Manual chapter: Your Right to Adequate Medical Care
- 4) Jailhouse Lawyer's Manual chapter: Your Right to be Free from Assault by Prison Guards and Other Prisoners
- 5) Fields v. Smith Amici Curiae: A Case in Support Hormone Therapy for Prisoners
- 6) Surviving Prison in California Advice By and For Transgender Women

Sincerely,

Jorge A. Pacheco,
Legal Intern | NCLR

Medunison

Page 1 of 1

order for female Clothing for
secondary sex Characteristics

Oklahoma Department of Corrections

Oklahoma Department of Corrections Private and DOC: ODOC Formulary Group Number:

PORTER, GLENN
OK DoC Offender ID 99595
02/19/1959 (59) M Caucasian
Dick Conner Correctional Center

Text Order**Under Garments**

Order Date: 03/16/2018

Status: Active

Duration: hours

Ordered By: Abraham Williams, Psych Clinician

Signed By: Abraham Williams, Psych Clinician

Patient: PORTER, GLENN

Order Details: (Inmate is allowed appropriate size and appropriate number of bras and panties consistent with that of a
female facility.**Comment History:**

The contents of this document are confidential and restricted to authorized personnel of the Oklahoma Department of Corrections.

Kandas 4-13-2018
Called me to Laundry
Sized, and ordered
by Laundry through
O.C.F.

13 April 2018

AFFIDAVIT of Chartel Williams
Title 12 OK, Stat. 431

I Chartel Williams #786148
Penalty of Perjury I WAS diagnosed for Gender Dysphoria
on the 17th of May 2018 By Patricia Jones At the Time Miss
Porter 99545 was Diagnosed by Patricia Jones who only saw us one
time less than 45 min, and didnt Ask Anything of Me
in Connection with Gender Dysphoria, C.W. _____

Declaration under Penalty of Perjury
I Chartel Williams Certify upon Oath and under
Penalty of Perjury the Above Statement is True

Dated 10 July 2018

X Chartel Williams 786148
Chartel Williams
D.C.C.C.
129 Conner rd.
Hominy OK. 74035

AFFIANT

in the UNITED STATES DISTRICT COURT
NORTHERN DISTRICT of OKLAHOMA

Miss Glenn Porter
Plaintiff

v.
Joe Albaugh et. al.
Defendants

Case No. _____

Plaintiff Miss Porter's
AFFIDAVIT:

- Possible Retaliation by
Prison officials for Reports
of Sexual Harassment and
Discrimination

→ Miss Porter, Plaintiff, Pro-se hereby Certifies upon Her Oath and Under Penalty of Perjury 28 USC 1746, That: "on the 13th Day of June 2018, At Dick Connors C.C. Miss Porter filed A Complaint of ^{#1} Sexual Harassment and ^{#2} Discrimination and Equal Protection (Separately) as Grievances under PREA on C/O West At Approx. 730 pm At the V+W Unit Gate. Initial Complaint to Warden Dowling And Responses [Granting] relief Appended here to, see: Doc of 090124, Doc of 030601, Also see: 42 USC 15, 601; 115.6(2) USCA Amend. 8, 14.

Retaliation (Doc of -110701, (1)(B))

hald's: "An Act, Covert or Overt of Vengeance or Threat of Action Taken Against AN OFFENDER in Response to the OFFENDERS Complaint of Sexual Harassment" in (relevant Part). Examples of Acts of Retaliation are unnecessary Discipline, Intimidation, unnecessary Changes in Work or Program Assignments, unjustified Transfers or Placements And unjustified denials of Privileges or Services."

Note → Medical staff At D.C.C.C. stopped my Hormone Replacement Therapy After 1 year 10 Months on July 10 2015. — order Appended,

Note → PREA Monitor Assessment: Doc of -030601 (X), (D), (Y) states "For At Least 90 Days Following A Report of Sexual Harassment A Facility designated Monitor shall assess the Conduct and Treatment of Inmates who Reported to suffer Sexual Harassment FOR CHANGES THAT MAY SUGGEST Retaliation by STAFF." PREA 115.67(C)

Request to Staff

DATE: June 15, 2018

TO: Porter, Glenn #99595
Unit V Cell #203

FROM:  Janet Dowling, Warden

RE: Request to Staff dated June 13, 2018.

Porter:

In accordance with OP-030601 "Oklahoma Prison Rape Elimination Act".

All Oklahoma Department of Corrections staff are provided and required to attend OP-030601 "Oklahoma Prison Rape Elimination Act" training.

Relief granted.

cc: Randy Harding, Deputy Warden, Facility PREA Coordinator
Aaron Peruskie, Chief of Security
Daniel Owens, Unit Manager

RECEIVED

JUN 14 2018

DCCC LAW LIBRARY

**Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF**

TO: Warden Dowling FACILITY/DIST/UNIT: DCCC DATE: 13 June 18
(NAME AND TITLE OF STAFF MEMBER)

I have have not X already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: facility: X grievance #:
I affirm that I do do not X have a grievance pending on this issue.
I affirm that I do do not X have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court:
This request does X does not relate to a pending misconduct report. If it does, this request may only be answered by the investigator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered. CP Staff DCCC single out transgender girls

On 13 June 2018 Officer West engaged in a discriminatory action to send me to the Capt. for a shirt I had on. It was covered. Others on the yard were not had worse shirts and for none on at all. He targeted me and sexually harassed me violating equal protection by singling me out as a transgender female and treating me dissimilar from
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.) Engage

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how. See Comments Before + After

Please stop the discrimination and equal protection violations of singling out transgender females here at DCCC and treating them dissimilar from other similarly situated inmates 42 USC 1981 et seq. DOC OP 030600 (case amendment)

NAME: Miss Glenn Parker ODO: NI 09545 UNIT & CELL NUMBER: VA 203
(PRINT)

SIGNATURE: Glenn Parker WORK ASSIGNMENT: VA Red orderly

DO NOT WRITE BELOW THIS LINE

DISPOSITION:

See attached

RECEIVED

JUN 19 2018

DCCC LAW LIBRARY

STAFF MEMBER

DATE

6-15-18Date response sent to inmate:

1. Original to file
2. Copy to Inmate/offender

ODOC 090124D (R 9/16)

Request to Staff

DATE: June 15, 2018

TO: Porter, Glenn #99595
Unit V Cell #203

FROM:  Janet Dowling, Warden

RE: Request to Staff dated June 13, 2018.

Porter:

All inmates must be dressed in accordance with OP-030501 "Personal Hygiene and Appearance Code" section

IV. Personal Hygiene and Appearance Enforcement

A. Inmates are responsible for maintaining their personal hygiene and appearance.

1. Inmate appearance standards prohibit the sagging of pants, wearing clothing items that have holes in them as a style of dress, are extensively stained or the display of any security threat group identification.

2. Shirttails will be tucked in.

B. Relaxed appearance standards may be specified by the facility head for recreational activities such as ball games, during exercise periods and after work hours while on the unit. Conditions when appearance standards may be relaxed will be posted in appropriate areas.

C. Inmates will be dressed at all times except for approved shower times and bathroom use.

D. Disciplinary actions may be taken for violations of hygiene, safety and appearance regulations.

Your request to "stop the discrimination and equal protection violations of singling out transgender inmates" is granted. All inmates male and female are required follow the guidelines of the agency policy.

cc: Randy Harding, Deputy Warden, Facility PREA Coordinator
Aaron Peruskie, Chief of Security
Daniel Owens, Unit Manager

Affidavit of Brandon Brady
Title 12 OK. STAT. 431

I Brandon Brady #697825
Thats I WAS told by A+C
Case Mgr. That Miss Porter
#99595 WAS going to be
Taken OFF Hormone Therapy
due to Number of Grievances
Filed. This WAS in the Month
of June of 2018. OK

Dated July 1st 2018

Declaration under Penalty of Perjury

I, Brandon Brady #697825 Certify upon my oath and under
Penalty of Perjury 28 USC 1746, and Title 12 OK. STAT. 426 the
Above declaration is True and Correct.

Dated July 1st 2018

Brandon Brady 697825

BRANDON BRADY
DCCC U/A 210
129 Conner rd,
Homer OK. 74035

AFFIRANT

AFFIDAVIT of Miss Porter
with Respect to deliberate
Indifference to Future Health
and Safety / Serious medical
Need

I, Miss Glenn Porter, Plaintiff, Pro-se, Certify upon my Oath and under declaration of Penalty of Perjury 28 USC 1746, That on the 5th of Sept. 2018 Approx. 0900 am hours I was havins Serious Mental and Physical Issues with With-
drawal of Hormones and Suppressors, my Face is Breakins out
and I'm beins Plagued with Hair due to Increased Testosterone
Levels. I Cut my Wrist and had the C/o on unit Mrs. Mont-
alvo Call Medical I was Cryins openly, She sent me Straigt
to medical. I Saw A.J. Williams and was Cryins I Shook up
and Told Him I Needed help. He declined to help me in
any way. He Said the one Person in the State that Can help
me has told me No. Patricia Jones, from Another Facility -
J.H.C.C. I Told him she made dmeanins references to my
Gender Statins I WAS Masqueradins As A Woman, and that
WAS Sexual Harrassment under Pree. ss 115.6 (2) and that A
Diagnosis contains sexual Harrassins Demeanins references
to my Gender was used to Withdraw my Hormone therapy and
I Was doins so Good before this. He still refused to help me.
I asked him to get me an outside specialist to make A
second opinion and he refused. I Told him it was unconstitution-
al to Withdraw my Hormones. ~~Direct~~ Maintenance of my second-
ary Sex Characteristics. He still refused to help me. Miss GP.

Declaration under Penalty of Perjury

I, Miss Porter, Plaintiff, Certify upon my Oath and under
Penalty of Perjury, 28 USC 1746, the Fore Soins is true and did
occur at Decc, on Sept 5, 2018 Approx. 0900 hours am.

Dated: Sept, 5th 2018

Miss Glenn Porter

Miss Glenn Porter 99595

D.C.C. 129 Conner rd

Homing OK. 74035

ARRIANT / Plaintiff Prose

Porter, Glen 99595
V-103

AFFIDAVIT of Miss Porter
with Respect to deliberate
Indifference to Future Health
and Safety / Serious medical
Need

I, Miss Glenn Porter, Plaintiff, Pro-se, Certify upon my Oath and under declaration of Penalty of Perjury 28 USC 1746, That on the 5th of Sept. 2018 Approx. 0900 am hours I was havins Serious Mental and Physical Issues with With-drawal of Hormones and Suppressors, my Face is Breakins out and Im beins Plagued with Hair due to Increased Testosterone Levels. I Cut my Wrist and had the C/O on unit Mrs. Mont-CIVO Call Medical I was Cryins openly, she sent me straight to medical. I saw A.J. Williams and was Cryins I Shook up and Told Him I Needed help. He declined to help me in any way. He said the one Person in the state that can help me has told me No. Patricia Jones, from another Facility - J.H.C.C. I Told him she made demeanins references to my Gender stating I WAS Masqueradins As A Woman, and that WAS Sexual Harassment under PRec. ss 115.6 (2) and that A Diagnosis contains sexual Harassins Demeanins references to my Gender was used to Withdraw my Hormone therapy and I was doins so good before this. He still refused to help me. I asked him to get me an outside specialist to make a second opinion and he refused. I Told him it was unconstitutional to Withdraw my Hormones. ~~Protect~~ Maintenance of my second-ary Sex Character'istics. He still refused to help me. Miss GP.

Declaration under Penalty of Perjury

I, Miss Porter, Plaintiff, Certify upon my Oath and under Penalty of Perjury, 28 USC 1746, the Fore Soins is True and did occur at Decc, on Sept 5, 2018 Approx. 0900 hours Am.

Dated: Sept, 5th 2018

Miss Glenn Porter

Miss Glenn Porter 99595

D.C.C. 129 Conner rd

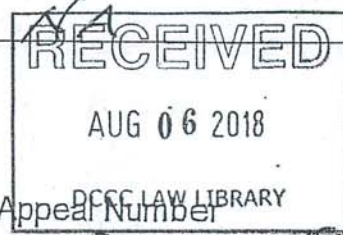
Hominy OK. 74035

ARRIANT / Plaintiff Pro-se

Porter, Glen
99595
V-103

COPY

Misconduct/Grievance Appeal To Administrative Review Authority

Inmate Name: Miss Glenn PorterDOC Number: #099595Jility Where ~~Offense~~ Grievance Occurred: DCCCOffense Code: NADate of misconduct violation: NA☐ Facility Misconduct Appeal Number NA☒ Facility Grievance Appeal Number NAD.C.C.C.-18-20I received the response of the reviewing authority at the facility on: 26 July 2018

Fill out this form in blue or black ink. Writing must be legible. I wish to appeal the reviewing authority's response to the misconduct/grievance on the following ground(s) only. DO NOT ATTACH ANY OTHER PAGES. (Use ONLY the back side of this page, if necessary). Your appeal will be returned to you unanswered if any other pages are submitted.

☐ Newly discovered/available evidence not considered by the reviewing authority, relevant to the issue, necessary for a proper decision, and why the evidence was not previously available which if considered may alter the decision (you must clearly state the newly discovered/available evidence); or

☒ Probable error committed by the reviewing authority in the decision such as would be grounds for reversal (you must clearly state the error committed by the reviewing authority, including citing the part of procedures or statutes not followed by the reviewing authority).

ponse:

EMERGENCY
in grievance D.C.C.C.-18-20, the Health Services Administrator Committee
Error in denial of the Above Grievance and Request for Sex Reassignment
Surgery. I Am A Transgender Female (documented). I Am A Woman
And Male Genitalia is Not At All A Comfortable feature to A Woman's
Perception of herself. I Am Very Embarrassed, Uncomfortable, Ashamed
depressed and Cannot face living with A Man's Body. I Am female
Michelle Lehnus denied My Request for (SRS) Citing An Evaluation

I understand that in accordance with OP-060125/OP-090124, I will be charged \$2 to appeal a misconduct/grievance to the Administrative Review Authority or Chief Medical Officer, and that this form is also a request for disbursement of funds from my trust fund draw account. If I do not have enough funds to cover this cost, the amount will be collected as soon as funds become available. over paid

Miss Glenn Porter
 Signature of Inmate

August 31st 2018
 Date

DOC 060125V (R 4/17)

Clinical Conclusion indicates that I do not have Gender Dysphoria.

However, on approx the 4th of October 2016 At Lawton Correctional Center a psychiatrist, Dr. Lane, M.D. And Dr. Sam Mussallam M.D. diagnosed me With Gender Dysphoria. - The Dept of Veterans Affairs Says I have Gender Identity Disorder Since Child hood. The M.D. Sam Mussallam on approx the 25th of Oct. 2016, Write me A RX for Estradiol 2mg and Aletactone. This Was all done by bio-risks Beginning 25 Sept. 2016 beginning as LCP-16-230. At the time the RX was Written and leading up to that ^{Amended to 16-551 ending Nov. 2016 At AOR} I Was in Serious distress, Confusion, Shame and An Underlying desire to Remove the Male stuff that is so disgust to me. I do not Want A Mans Body, I M A female. 100% - Mrs. Jones diagnosis is incorrect and placing Me in a Serious Risk of Harm and denies A Serious Medical Need, see: 8th and 14th Amend. U.S.C. I Would point to Fields v. Smith, 712 F.Supp.2d 830; where the United States Courts of Appeals Relied on the Merck Manual holding that When not properly treated GID Can Result in Significant psychological Distress, dysfunction, debilitating depression and for some people, self mutilation, thoughts and Attempts of Suicide and death. See: Diagnostic Statistical Manual Mental Disorders; George Brown, Autocastration and Auto Penectomy as Surgical Self Treatment in Incarcerated Persons with GID; 12 International Journal of Transgenderism. The risks are Both physical and psychological -- such as Auto Castration, depression and suicide. The only Way I have to Relieve the distress Was Hormones and I Li As A Woman. Fields id. At ps.(6) ¶ 27 "As A Result of the Disorder some Male to female Individuals With GID Resort to Self Treatment With Hormones or some Cases Attempt their own Castration or penectomy. See: D.S.M., in these Cases, Suicide Attempts and Substance Related Disorders are Common. The literature in the field is REplete with accounts of Individuals who have taken their own lives Because their GID Was Not Properly Assessed and Treated. in Fields id. At (10) As A Result of Being deprived of Hormone Therapy, Plaintiff Andrea Fields, Suffered from Nausea, muscle weakness, loss of appetite, Increased Hair growth and depression. D.O.C. is Aware of the emotional and physical distress that will occur. The experts Recognized to discontinue Hormones for some Individuals Would Be Cruel and Irresponsible. Also Fields At (10) holds that in DeLonta v. Angebore, 330 F.3d At 630, A Male to female Patient with GID Was Abruptly Barred from Hormone Therapy and developed an uncontrollable urge to Mutilate her genitals, DeLonta id. At 632. The Lack of Hormone Therapy on patients With severe GID, Especially one who Previously Received the ment, Will break havoc on their physical and emotional state which is neither compensable nor speculative. By Mrs Jones incorrect diagnosis when she only saw me less than 1 hour and one time only and she lunch part of that time she stopped my hormones after Almost 2 years and placed me at a serious risk of harm. Please help me. I don't want to

Grievance Deci:

Inmate/Offender

Name: Glenn Porter

Grievan

Catego

Receipt Date: 7/16/18

Code:

1. Discrimination 3. Complaint against staff 5. Di

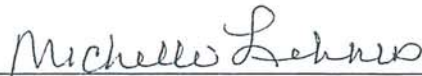
2. Classification. 4. Condition of confinement 6.

Decision: OP-140147 'Management of G
"Diagnosis of Gender Dysphor
professional based on the diag
Manual of Mental Disorders"

OP-140147 'Management of G
"Surgical procedures for the in
reassignment will not be perfor
requiring recommendation from
medical officer and the director

You were evaluated by Dr. Pat
2018. Her clinical conclusion i
of Gender Dysphoria; therefore
reassignment as per OP-1401.

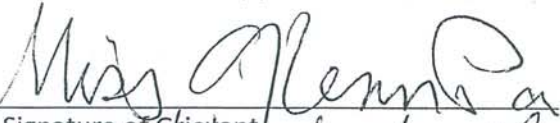
Relief Denied.



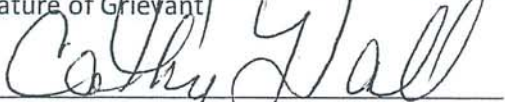
Reviewing Authority – Facility Health Services

Review Authority – Facility/District/Unit Head

I have received a copy of the decision of the re



Signature of Grievant



Signature of Staff Witness and Printed Name o

You may appeal to the Administrative Review Authority or Pers
73136-0400 or Medical ARA at 2901 N. Classen Blvd, Suite 200,
Form 060125V entitled "Misconduct/Grievance Appeal To Admin
Authority or Medical ARA.

1. Original to file
2. Copy to inmate/offender

Reviewing Authority

DOC Number: 99595

Grievance

Number: 18-20

ccess 7. Medical 9. Records/ Sentence Admin.
Property/Trust

nd 10. Religion 11. Personal Identity

onconforming Inmates' Section II. B. states:
een confirmed by a qualified mental health
riteria of the Diagnostic and Statistical

onconforming Inmates' Section IV. D. states:
idvancement, or maintenance of sex
cept in extraordinary circumstances,
, as well as authorization of both the chief

ones, Psy.D. Staff Psychologist on May 17,
that you do not currently have a diagnosis
not meet criteria for surgical sex

Medical Issues)

7-25-18

Date

Date

Authority.

26 July 18

Date

07-26-18

Date

ARA at Department of Corrections, P.O. Box 11400, Oklahoma City, OK
y, OK 73106, within 15 days of the receipt of response using only DOC
ew Authority." Do not send this decision to the Administrative Review

INMATE/OFFENDER GRIEVANCE

Grievance no. _____

Grievance code: _____

Response due: _____

DO NOT WRITE ABOVE THIS LINE

Date 11 July 2018Facility or District D.C.C.C.Name Miss Glenn Porter
(Print)Facility Housing Unit V/A 203ODOC Number #99595Date "Request to Staff" response received: 10 July 2018

Have you previously submitted a grievance on this same issue? N/A If yes, what date N/A, facility N/A, grievance # N/A. You must submit this completed original within 15 days of the receipt of the response to the "Request to Staff". The "Request to Staff" must have been submitted within 7 days of the incident. Do not include/attach anything to this grievance except the "Request to Staff" including the response. You may quote from or make reference to statutes, operations, field, or administrative memoranda, department publications (time sheets, inventory forms, assessments, etc.). You will be permitted only one opportunity to correct any error(s) made in submitting your grievance.

1. The nature of your complaint. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per grievance. Use backside of this page only, if necessary. on 28th of June 2018 I WAS Told by Medical STAFF AT D.C.C.C. That I didnt have Gender Dysphoria. Your answer to the Attached Request to STAFF is IN Error, I do have A DIAGNOSIS of Gender Dysphoria. MADE on 4th of Oct. 2016. Its in my File by Drs. Lane and Mussalam. At Geo, I AM Female and you are Attempting to Force me to Live AS A MAX. THATS Unacceptable, Very Embarrassing Stressful And is Very depressing AS Well.
2. Informal action taken (including dates) to resolve the complaint, as well as the names of those employees from whom you sought an answer to your grievance. ① DTS 28th June 2018, ② RTS 6 Nov 2015, ③ Grievance # LCF-16-230, ④ RTS 29 May 2016, ⑤ Grievance to PIARA, May 5, 2016, ⑥ Amended Grievance 16-230 July 15 2016, ⑦ Grievance 4th April 2016, ⑧ RTS 22 July 2016, Grievance Amended to- 16-551 by PIARA Granting Partial Relief, ⑨ Grievance RTS 16-551, 22 July 2016, ⑩ 11th Aug. 16, Grievance 16-551, ⑪ - Oct. 24, 16, Grievance 16-551 Med. Ser. Admin. ⑫ resubmitted LCF-16-551 - Granting Relief Med. Services Administrator, O.P.O.C.
3. The action you believe the reviewing authority may lawfully take.

Provide SEX Reassignment

Surgery USC A Amend. P, 14

Better read it → Del Lantay Angelone, 330 F3d 634-35

Grievance report sent to (warden/district supervisor/correctional health services administrator):

Michelle GehrusHealth Services Admin.

Name

Title

Miss Glenn Porter11 July 2018

Signature of Grievant

Date Sent to Reviewing Authority

Dick Conner Correctional Center

Received

DOC 090124A (R 7/16)

Original to file

Copy to inmate/offender

JUL 16 2018

Medical

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RECEIVED

JUL 02 2018

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process

REQUEST TO STAFF

DCCC LAW LIBRARY
TO: Michelle Lehman ASA

FACILITY/DIST/UNIT: DCCC

DATE: 28 Jun 18

(NAME AND TITLE OF STAFF MEMBER)

I have ☐ have not ☒ already submitted a "Request to Staff" or grievance on this same issue.
 If yes, what date: 28 facility: 28 grievance #: 28
 I affirm that I do ☐ do not ☒ have a grievance pending on this issue.
 I affirm that I do ☐ do not ☒ have a lawsuit of any type pending that relates in any way to this issue.
 If a lawsuit is pending, indicate case number and court: 28
 This request ☐ does ☒ does not relate to a pending misconduct report. If it does, this request may only be answered by the investigator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

On 28 Jun 2018 I was told I didn't have gender dysphoria and this is another attempt to force me into a male gender role. I do not identify as a male and am in constant embarrassment, disgust and I do not want to be in the body of a man. The assessment of Patricia Jones did not in any way try to determine or ask me at all if I had any mental stress daily. (USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.) in my life

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

This decision places me at an extreme risk of worsened depression, embarrassment, mental stress and I am a female and it's not constitutional to force me to live in a male gender body. Please also provide sex reassignment surgery. USCA Amend 8/14 Field V Smith, 712 F.Supp.2d 830, Belmont v. Angelone, 330 F.3d 630.

NAME: Miss Glenn Porter

(PRINT)

ODOC NUMBER: 99595 UNIT & CELL NUMBER: V/A 203

SIGNATURE: Miss Glenn Porter

WORK ASSIGNMENT: V/A Pod orderly

DO NOT WRITE BELOW THIS LINE

DISPOSITION:

You do not currently have a diagnosis of gender dysphoria, therefore, you do not meet criteria for gender sex reassignment.

RECEIVED

JUL 10 2018

DCCC LAW LIBRARY

Michelle Lehman
STAFF MEMBER7-6-18
DATEDick Center Correctional Center
Received

JUL 02 2018

ODOC 090124D (R 9/16)

Date response sent to inmate:

1. Original to file
2. Copy to inmate/offender

Medical 23

Plaintiffs AFFIDAVIT of
Grievances that [Failed to -
Respond] within Time FRAMES
IN Grievance Policy DOCUMENT

I, Miss Glenn Porter, Plaintiff, Pro-se hereby Certify the
Following, UPON Her OATH and UNDER Penalty of Perjury 28
USC 1746, are True:

- (1) - Jernigan v. Stuchall, 304 F.3d 1030^{At 1032}, holds When the Authorities
Fail to Respond Within the Time Frames CONSTRAINED Within
the Grievance Policy it renders Remedy UNAVAILABLE and is
Deemed Exhausted - fn(1) see Also: Faulk v. Chanier, 262 F.3d 687, 697, 98;
- (2) - Diligent Attempts to Exhaust is Considered Exhausted.
- (3) - on August 6th 2018 Plaintiff, E-mailed A Request to staff
to Patricia Jones at Joseph Horp C.C. Initiating Grievance
Process: Def. Jones had 10 days to Answer and has failed
to Respond. Approx. 6 Sept. 2018 Plaintiff E-mailed A
Grievance to def. Jones for Failure to Respond. Both
were E-mailed via DCCC Law Library Supervisor.
(Copies Are Appended) For (Withdrawal of Hormones)
see: Faulk At Id. 697-698
- (4) - on August 6th 2018 Plaintiff via Prison Privileged Mail
System at DCCC Law Library Mailed A Grievance to
PIARA, Chief medical Director M^cCurdy. A Grievance
for Failure to Respond WAS Mailed on or About Sept. 6 2018
Plaintiff Also Filed Failure to Respond, grievances Appended
RTS / Grievance Appeal to Facility and Form V Appeal to
(PIARA are Appended) For (Sex Reassignment Surgery)
citing: Faulk v. Chanier, Id. At 697-698

Declaration under Penalty of Perjury

I Miss Porter Plaintiff Certify upon oath and under
Penalty of Perjury, 28 USC 1746, the Foregoing is True.

Dated: 5 Sept. 2018

Miss Glenn Porter
Miss Glenn Porter 99595
DCCC U.A 103
129 Conner rd,
Homing OK. 74035

APPIANT / Plaintiff

fn(1) Where Prison officials Prevent, Thwart or Hinder a Prisoners
efforts to Avail himself of An Administrative Remedy, [THEY RENDER -
THAT REMEDY] "UNAVAILABLE" and A Court will Excuse Prisoners Fail-
ure to Exhaust. "LYON V. Vande Krol, 305 F.3d 806 At 808
Citing: Faulk v. Chanier, 262 F.3d 687, 697-98, Jernigan At 1032

Plaintiffs AFFIDAVIT of
Grievances that [Failed to -
Respond] within Time FRAMES
in Grievance Policy DOCUMENT

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- (2) - Diligent Attempts to Exhaust is Considered Exhausted.
- (3) - Withdrawal of Hormones
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to Respond. Approx. 6 Sept. 2018 Plaintiff E-mailed A
Grievance to def. Jones for Failure to Respond. Both
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(Copies Are Appended) For (Withdrawal of Hormones)
see: Faulk At Id. 697-698
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PIARA, Chief medical Director M^cCurdy. A Grievance
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Plaintiff Also Filed Failure to Respond, grievances Appended
RTS / Grievance Appeal to Facility and Form V Appeal to
(PIARA Are Appended) For (Sex Reassignment Surgery)
citing: Faulk v. Chanier, Id. At 697-698

Declaration under Penalty of Perjury

I Miss Porter Plaintiff Certify upon oath and under
Penalty of Perjury, 28 USC 1746, the Foregoing is True.

Dated: 5 Sept. 2018

Miss Glenn Porter
Miss Glenn Porter 99595
DCCC U.A 103
129 Conner rd.
Homing OK. 74035

APPIANT / Plaintiff

fn(1) Where Prison officials Prevent, Thwart or Hinder a Prisoners
efforts to Avail himself of An Administrative Remedy, [THEY RENDER -
THAT REMEDY] "UNAVAILABLE" and A Court will Excuse Prisoners Fail-
ure to Exhaust. LYON V. Vande Krol, 305 F.3d 806 At 808
Citing: Faulk v. Chanier, 262 F.3d 687, 697-98, Jermison At 1032

**OKLAHOMA DEPARTMENT OF CORRECTIONS
REQUEST FOR HEALTH SERVICES**

TO BE COMPLETED BY INMATE

Facility: DCCC Date: 8 AUG 18Inmate Name: Miss Glenn Porter ODOC # 99595 Unit V/A 103

I request the following service(s): (Check appropriate box(es))

☐ Medical ☒ Mental Health ☐ Dental ☐ Optometry (eye) ☐ Medication Renewal
(expired medications only)

Reason for service: I Need to see A PSYCHIATRIST
I'M HAVING SERIOUS MENTAL/EMOTIONAL DISTRESS
FROM HAVING ERECTIONS, HAIR GROWTH, BREAKING OUT OF MY
SKIN DUE TO THEM STOPPING MY ESTROGEN AND SUPPRESSORS. I
AM AFRAID, EMBARRASSED THIS I BELIEVE IS A MENTAL HEALTH
ISSUE, PLEASE REFER TO A "PSYCHIATRIST" USCA 8, 14
I understand that in accordance with operations memorandum OP-140117 entitled "Access to Health Care", I will be charged \$4 for each medical service I request and a charge of \$4 for each medication(s) dispensed to me, with the exceptions noted in the above-reference operations memorandum. There is no charge to the inmate for mental health services and/or mental health medications.

Inmate Signature

Miss Glenn PorterDate: 8-8-18

TO BE COMPLETED BY HEALTH SERVICES

Date Received

8-11-18

Initials

MPComment: you are scheduled with the psychiatrist 08.20.2018

Anthony Williams
RN/LPN/Health Care Provider Signature

08.13.2018

Date

"Return the "Request for Health Services" with the disposition of the inmate's request in the comment section to the inmate after scanning into the inmate's EHR.

NOTE: All "Keep on Person" (KOP's) medication refill requests must be submitted to the facility's health services unit or to the medical host facility, using the "Medication Refill Slip" (DOC 140130M) "Medication Refill Slips" must be submitted within ten days of the date the medication expires or runs out. "Medication Refill Slips" are readily available and accessible at designated locations within the facility.

OKLAHOMA DEPARTMENT
REQUEST FOR HEALTHCORRECTIONS
SERVICES

TO BE COMPLETED BY OFFENDER

Facility

CF

Date: 10 OCT 17

Offender Name Miss Glenn Porter DOC # 99595 Unit EC # 102

I request the following service(s): (Check appropriate box(s))

☒ Medical ☐ Mental Health ☐ Dental ☐ Optometry (eye) ☐ Medication Renewal
(expired medications only)

Reason for service: Please Provide Sex Reassignment Surgery

Kosilek v. Maloney, 221 F. Supp. 2d 156
 Phillips v. Michigan Director, 731 F. Supp. 792
 Fields v. Smith, 712 F. Supp. 2d 830
 DeLonta v. Angelone, 330 F.3d 680
 USCA Amend 8
 Thank you

I understand that in accordance with operations memorandum OP-140117 entitled "Access to Health Care", I will be charged \$4 for each medical service I request and a charge of \$4 for each medication(s) dispensed to me, with the exceptions noted in the above-reference operations memorandum. There is no charge to the offender for mental health services and/or mental health medications.

Offender Signature

Miss Glenn Porter

Date: 10 Oct 17

TO BE COMPLETED BY HEALTH SERVICES

Date Received
OCT 12 2017

Initials

RB

Comment: Routine - you are scheduled to see the nurse

Qualified Health Care Professional

LPN 10/12/17

Date

NOTE: All "Keep on Person" (KOP's) medication refill requests must be submitted to the facility's health services unit or to the medical host facility, using the "Medication Refill Slip" (DOC 140130M). "Medication Refill Slips" must be submitted within ten days of the date the medication expires or runs out. "Medication Refill Slips" are readily available and accessible at designated locations within the facility.

Date: 3 July 18

• Plot # 99595 Unit V/A203

10 (c) (4) Medication Renewal

USCA Amend. 8, 14

Date: 3 July 18

Initials

Date _____

ODOC 140117A
(R 5/17)

OKLAHOMA DEPARTMENT OF CORRECTIONS
REQUEST FOR HEALTH SERVICES

TO BE COMPLETED BY INMATE Facility: D.C.C.C. Date: 28 Jun 18
 Inmate Name: Miss Glenn Porter ODOC # 99595 Unit 21A 203
 I request the following service(s): (check appropriate box)

☒ Medical ☐ Mental Health ☐ Dental ☐ Obstetrics (v-a) ☐ Medication Renewal
 (expired medications only)

Reason for service: Please Provide Sex Reassignment
Surgery I cannot ~~not~~ live as a man. Fields v Smith, 712 F. Sup,
2d 830; De'Lunta v. Angelone, 330 F.3d 630; Kosilek v. Maloney, 221 F. Sup,
2d, 156; U.S. Const. Amend, 8, 14, 1' 42 USC 1983

I understand that in accordance with operation memorandum OP-140117 entitled "Access to Health Care", I will be charged \$4 for each medical service I request and a charge of \$4 for each medication(s) dispensed to me, with the exceptions noted in the above-reference operations memorandum. There is no charge to the inmate for mental health services and/or mental health medications.

Inmate Signature: Miss Glenn Porter Date: 28 Jun 2018

TO BE COMPLETED BY HEALTH SERVICES

Date Received

6/30/18

Initials

He

Comment: Appt 7/16/18

[Signature]
 RN/LPN/Health Care Provider Signature

6/30/18
 Date

"Return the "Request for Health Services" with the disposition of the inmate's request in the comment section to the inmate after scanning into the inmate's EHR.

NOTE: All "Keep on Person" (KOP's) medication refill requests must be submitted to the facility's health services unit or to the medical host facility, using the "Medication Refill Slip" (DOC 140130M). "Medication Refill Slips" must be submitted within ten days of the date the medication expires or runs out. "Medication Refill Slips" are readily available and accessible at designated locations within the facility.

RECEIVED

JUL 02 2018

DCCC LAW LIBRARY

TO: Michelle Lehman HSA
(NAME AND TITLE OF STAFF MEMBER)Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFFFACILITY/DIST/UNIT: DCCCDATE: 28 Jun 18

I have have not X already submitted a "Request to Staff" or grievance on this same issue.
 If yes, what date: facility: grievance #:
 I affirm that I do do not X have a grievance pending on this issue.
 I affirm that I do do not X have a lawsuit of any type pending that relates in any way to this issue.
 If a lawsuit is pending, indicate case number and court:
 This request does X does not relate to a pending misconduct report. If it does, this request may only be answered by the investigator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

On 28 Jun 2018 I was told I didn't have Gender dysphoria
And this is another attempt to force me into a male gender role
I do not identify as a male and am in constant embarrassment
disgust and I do not want to be in the body of a man
The Assessment of Patricia Gones did not in any way try to
determine or ask me at all if I had any mental stress daily
in my life

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

This decision places me at an Extreme Risk of worsened depression
Embarrassment mental stress and I am a female and it's not
Constitutional to force me to live in a male gender body. Please
also provide sex reassignment surgery. USCA Amend 8/14 Field V
Smith, 712 F.Supp.2d 830, Belmont v. Prigione, 330 F.3d 630,
 NAME: Miss Glenn Porter ODOC NUMBER: 99595 UNIT & CELL NUMBER: V/A 203
 (PRINT)

SIGNATURE: Miss Glenn Porter WORK ASSIGNMENT: V/A Pod orderly

DO NOT WRITE BELOW THIS LINE

DISPOSITION:

You do not currently have a diagnosis of gender dysphoria
therefore, you do not meet criteria for gender sex reassignment

RECEIVED

JUL 10 2018

DCCC LAW LIBRARY

Michelle Lehman
STAFF MEMBER

Date response sent to inmate:

1. Original to file
2. Copy to Inmate/offender

DATE

7-6-18 Dick Connor Correctional Center
Received

JUL 02 2018

ODOC 090124D (R 9/16)

**OKLAHOMA DEPARTMENT OF CORRECTIONS
REQUEST FOR HEALTH SERVICES**

TO BE COMPLETED BY INMATE: Facility: DCCC Date: 7 AUG 18
Inmate Name: Miss Glenn Porter ODOC # 99595 Unit VA1B3

I request the following service(s): (check appropriate box(es))

☐ Medical ☒ Mental Health ☐ Dental ☐ Optometry (eye) ☐ Medication Renewal
(expired medications only)

Reason for service: IM HAVING SERIOUS Hot Flashes, Erections
HAIR AND BREAKING OUT, - USCA Amend. 8.14, This
IS FROM STOPPING MY Estrogen And Suppressors YOU
ARE VIOLATING THE 8th Amend US C doing this TO ME,
IM HAVING Nausea to

I understand that if I do not pay for my health care, I will be charged \$4 for each medical service I request and a charge of \$4 for each medication(s) dispensed to me, with the exceptions noted in the above-reference operations memorandum. There is no charge to the inmate for mental health services and/or mental health medications.

Inmate Signature: Miss Glenn Porter Date: 7 AUG 18

TO BE COMPLETED BY HEALTH SERVICES

Date Received

8-18-18

Initials

W

Comment: Please Submit a SCR to medical Services to address
your health concerns.

Alphonse Williams

RN/LPN/Health Care Provider Signature

08-03-2018

Date

"Return the "Request for Health Services" with the disposition of the inmate's request in the comment section to the inmate after scanning into the inmate's EHR.

NOTE: All "Keep on Person" (KOP's) medication refill requests must be submitted to the facility's health services unit or to the medical host facility, using the "Medication Refill Slip" (DOC 140130M). "Medication Refill Slips" must be submitted within ten days of the date the medication expires or runs out. "Medication Refill Slips" are readily available and accessible at designated locations within the facility.

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Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

COPY

TO: Michelle Lehman HSA FACILITY/DIST/UNIT: DCCC

DATE: 29 Jun 18

I have X have not already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: 28 Jun 2018 facility: DCCC grievance #: NA
I affirm that I do do not X have a grievance pending on this issue.
I affirm that I do do not X have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: Not At this time
This request does X does not relate to a pending misconduct report. If it does, this request may only be answered by the investigator assigned to the misconduct.

SUBJECT: Please Forward to PIARA on your Request for Reassess State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered. Please Inform PIARA of this violation of 8th Amend.
On approx. 28th June 2018, I was told by Health Services my hormone replacement therapy was to stop. As a result of Patricia Jones diagnosis 5-15-2018 which incorrectly said I did not have Gender Dysphoria. To the contrary on 10-4-16 I was diagnosed with extreme Gender Dysphoria. When placed on Estradiol I did immediately gain benefit. But I was not cured, I am very embarrassed, ashamed & disgusted I am imprisoned.
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how. Attempting to force me to live as a male will make prison officials deliberately indifferent if they place me at a serious risk of future harm stemming from this. Stopping my hormones violates the 8th Amend. USC and Equal Protection USCA Amend. 14. Your decision has me totally scared. I been doing better, why are you doing this its contrary to sound medical judgement.
NAME: Miss Glenn Porter ODOC NUMBER: 99595 UNIT & CELL NUMBER: V/A 103

SIGNATURE: Miss Glenn Porter
(PRINT)

WORK ASSIGNMENT: V/A Pod orderly

DO NOT WRITE BELOW THIS LINE

DISPOSITION:

STAFF MEMBER

DATE

Date response sent to inmate:

ODOC 090124D (R 9/16)

Gender. I am disgusted and very embarrassed to have male genitalia. I'm disgusted with the hair all over me and it's also very embarrassing to me. I am a fanatic to have any hair & shave from my head down 2 x's daily - I can only find ways like wearing make up and making my face and dress like the woman & am in clothing that is feminine to alleviate the stress & go through daily. Even on hormones, I'm seriously disgusted being in a man's body and almost all staff in DC try to force me to live in a male role. I reject it and cannot do it. It violates the Constitution when prison staff causes significant injury, or an unnecessary and wanton infliction of pain or by exposing a prisoner to a substantial risk of future harm when the prison officials denies the prisoner medical treatment or offers care that is so incompetent it amounts to no care at all, Estelle v. Gamble, 429 US 97, 103, 101 S.Ct. 1548, 85 F.Supp.2d 228, 248, holding: "Prison officials are deliberately indifferent, when they fail to remove or place a prisoner in a serious risk of future harm, stemming from G.I.D. stopping my hormones is so blatantly inappropriate it is evidence of intentional mistreatment and torture and wanton infliction of pain and exposes me to a serious risk of future harm and likely to seriously aggravate my medical condition. see: Edwards v. Snyder, 478 F.3d at 831 - in Phillips v. Michigan Dept. of Corrections, 731 F.Supp. 792, 799 taking measures which would actually reverse the effects of healing medical treatment is measurably worse than failing to provide such treatment in the 1st place - citing DeLonta v. Angelone, 330 F.3d at 634-35. My attempt to gain my clothing and cosmetics through grievances and I do have many show that even on hormones I'm still trying to find ways to lessen the degree of significant embarrassment, disgust and shame and stress of daily having to live in a male body when I'm a woman and I have been diagnosed in Oct. 2016 believe that this new diagnosis after 1 1/2 years of benefit from the hormones was meant to inflict wanton pain and expose me to a serious risk of future harm. Allard v. Gomez, 9 F.App'x 793, 795 held its deliberate indifference to transgender prisoner is denied hormone therapy. Riely v. Smith, 653 F.3d at 557-58 held it constitutes facial violation of 8th Amend. USCAAMend 8/14.

refined
ok
201 classes

PREA COMPLAINT
Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process

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TO: Dr. Joel McCurdy FACILITY/DIST/UNIT: Doc Admin DATE: 29 Aug. 18
(NAME AND TITLE OF STAFF MEMBER)

I have ☒ have not ☐ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: 29 Aug 2018 facility: SHCC/DCCC grievance #: N/A
I affirm that I do ☐ do not ☒ have a grievance pending on this issue.
I affirm that I do ☐ do not ☒ have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: In Process of Initiating
This request ☐ does ☐ does not relate to a pending misconduct report. If it does, this request may only be answered by the investigator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

PREA PAPER WORK 28 CFR Part 115
Dr. McCurdy my Name is Miss Glenn Porter. Dr Patricia Jones May
17 2018 Clinical Conclusion (Summary) states "I'm Masquerading
As A Woman." That is A Very demeaning Reference to My Gender.
I'M A WOMAN 100%? I'M NO DRAG QUEEN OR PRETENDER.
This Conclusion is A STATEMENT Constituting Sexual Abuse
Harassment under PREA 42 USC 15101 ss 11516 (2) And is
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.) Being Used

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

Please Stop This negligent Conclusion from MAKING A
Victim of Me to This - Its A Demeaning Reference to
My Gender That's Being Used to Withdraw my Hormone
Therapy. It Violates PREA ss 11516(2) And the 8th Amend.
28 CFR part 115
NAME: Miss Glenn Porter (PRINT) ODOC NUMBER: 99595 UNIT & CELL NUMBER: VA103

SIGNATURE: Miss Glenn Porter WORK ASSIGNMENT: ⓪

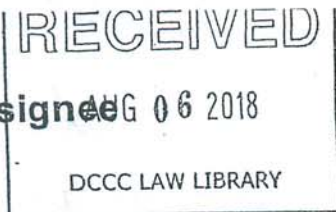
DO NOT WRITE BELOW THIS LINE

DISPOSITION:

STAFF MEMBER _____ DATE _____

A Statement / Comment on that contains Sexual Harassment
Prohibited by PDEA, re: 115.16(2) A demeaning reference
to my Gender is Being used to Dic. my Estrogen therapy
After Almost 2 years of what to me was A Real Wonder
Benefit, that helped me unbelievably. I've Been Healthy,
for once in my life - And Able to Cope Somewhat - I have
Not done Any thing to have this happen to me Nor do I
deserve this. I'm Scared Now to death - I Cant
Live As A Man - And A demeaning reference (that
I'm Masculinizing As A Woman) to my Gender is
Being used to place me in A serious Risk of Immediate
Harm and Irreparable Injury to my long term Health As
well As Being used to Force Me to Live As A Man... That's
Not Sonne Ever happen - This Action is Cruel Irresponse
Able And Places me At A serious Risk of Harm. All
Based on A BLATANT Statement Containing Sexual
Abuse / Harassment Prohibited by PDEA.

August 11, 2018
COPY



**Must Be Submitted Through the Law Library or Designated
Inmate/Offender Grievance Process
REQUEST TO STAFF**

TO: Patricia Jones Md. FACILITY/DIST/UNIT: JHCC DATE: 6 Aug 2018
(NAME AND TITLE OF STAFF MEMBER)

I have ☒ have not ☐ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: 15 July 18 facility: DCCC grievance #: NA
I affirm that I do ☐ do not ☒ have a grievance pending on this issue.
I affirm that I do ☐ do not ☒ have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: Not yet?
This request ☐ does ☒ does not relate to a pending misconduct report. If it does, this request may only be answered by the investigator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

You have placed me a female in a serious risk of
future harm by stopping my estrogen. I've been diagnosed
by Dr. Lane and Dr. Mussallam at Geo and McCurdy helped
with it. See LCF-16230 - Amended -> LCF 16-551 PIARA
Your actions violate the 8th Amend, 14th Amend, USC
Fields v. Smith, 712 F. Supp. 2d 630 Delanta v. Angelone 330 F.3d 630,
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

stop exposing me to a risk of serious
harm by stopping my estrogen therapy. I am female
and now in serious stress embarrassment, depression
this action constitutes deliberate indifference.

NAME: Miss Glenn Porter (PRINT) ODOC NUMBER: 99595 UNIT & CELL NUMBER: 4A 103

SIGNATURE: Miss Glenn Porter WORK ASSIGNMENT: D

DO NOT WRITE BELOW THIS LINE

DISPOSITION:

STAFF MEMBER

DATE

Date response sent to inmate: _____

1. Original to file

ODOC 0001240 (R 9/16)

Nothing you ask me about was concerning
Gender Dysphoria. AJ Williams Agreed-
And I have statements from others you diagnosed
Same day to same effect. You only saw me
one time less than 45 min. and at lunch part of
that - I'm A Female 100% And Now in Serious
Confusion Stress depression And Need Sex
Reassignment Surger. I'm Not going to
live in A MANS Body With MALE genitalia.

Miss Glenn Dots 99595
DCCC VA 103
129 Canner rd.
Hamming OK
74035

RECEIVED

SEP 10 2018

Mark C. McCart, Clerk
U.S. DISTRICT COURT

Postmarked
9/11/18

18 CV 422 JED - TIM

Clark
U.S. Court house
333 W. 4th St, Va
Tuba OK. 74103

LEGAL

